Marcus Leinart State Bar No. 00794156 Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax ATTORNEY FOR DEBTOR

IN RE.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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III KE.	8
TYHARA YVONNE ROSS	8 § CASE NO. 23-30249-MVL-13
Debtor	§ CHAPTER 13
OFFICE OF THE STANDING	<u> </u>
CHAPTER 13 TRUSTEE	§
Movant	§
	§
vs.	§
	§
TYHARA YVONNE ROSS	§
	e

OPPOSED RESPONSE TO TRUSTEE'S 17 DAY NOTICE OF INTENT TO CERTIFY CHAPTER 13 CASE FOR DISMISSAL PER GENERAL ORDER 2021-05

TO THE HONORABLE COURT AND INTERESTED PARTIES:

Debtor herein objects to the Trustee's 17 Day Notice of Intent to Certify Chapter 13 Case for Dismissal per General Order 2021-05 dated 06/12/2023.

Debtor requests that the Chapter 13 Plan payment arrears be cured by being allowed until 07/13/2023 to be current without risk of Dismissal during the interim.

DATED: June 29, 2023

Debtor

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320

Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on a true and correct copy of the foregoing Opposed Response to "Trustee's 17 Day Notice of Intent to Certify Chapter 13 Case for Dismissal per General Order 2021-05," was served on the date the instrument was filed electronically. Service was accomplished electronically on the Trustee and all parties who filed a notice of appearance consenting to electronic service.

DATED: June 29, 2023

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
ATTORNEY FOR DEBTOR

Marcus Leinart State Bar No. 00794156 Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

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TYHARA YVONNE ROSS
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CASE NO. 23-30249-MVL-13
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Debtor
\$
CHAPTER 13

NOTICE OF HEARING

You are hereby notified of the foregoing Objection to Trustee's 17 Day Notice of Intent to Certify Chapter 13 Case for Dismissal per General Order 2021-05. A pre-hearing conference on this matter will be held at 8:30 a.m. on 07/13/2023, at the Office of the Dallas Standing Chapter 13 Trustee, 105 Decker Court, Ste 120, Irving, TX 75062. Matters not resolved at the pre-trial conference will be heard by the Honorable Stacey G. C. Jernigan at the Bankruptcy Court at 2:00 p.m. on the same day via the Webex hearing link:

https://us-courts.webex.com/meet/jerniga

Information and Instructions for this hearing can be found with the following link:

 $\underline{https://www.txnb.uscourts.gov/judges-info/hearing-dates/chief-judge-jernigans-hearing-dates} \\$ dates

Other than the Debtor, you do not have to attend the pre-hearing conference or hearing unless you are opposed to the aforementioned Motion.

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart Marcus Leinart State Bar No. 00794156 ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on a true and correct copy of the foregoing "Notice of Hearing," was served on the date the instrument was filed electronically. Service was accomplished electronically on the Trustee and all parties who filed a notice of appearance consenting to electronic service.

DATED: June 29, 2023

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart Marcus Leinart State Bar No. 00794156 ATTORNEY FOR DEBTOR